

# **EXHIBIT 13**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DAVIDSON HENAO, MIGUEL MERO,  
OMOBOWALE AVOSEH, RASHEEM MARTIN,  
and SHAWN WILLIAMS, for themselves and all  
others similarly situated,

Plaintiffs,

v.

PARTS AUTHORITY, LLC, PARTS AUTHORITY,  
INC., YARON ROSENTHAL, NORTHEAST  
LOGISTICS, INC. d/b/a "Diligent Delivery  
Systems," ARIZONA LOGISTICS, INC. d/b/a  
"Diligent Delivery Systems," BBB LOGISTICS,  
INC. d/b/a "Diligent Delivery Systems," MICHIGAN  
LOGISTICS, INC. d/b/a "Diligent Delivery  
Systems," LARRY BROWNE, DOES 1-20 d/b/a  
"Diligent Delivery Systems," and DOES 21-40,

Defendants.

19-cv-10720 (LGS) (BCM)

**DEFENDANT BBB LOGISTICS,  
INC.'S ANSWERS TO PLAINTIFFS'  
FIRST SET OF INTERROGATORIES**

In accordance with the Court's orders in the above-captioned action on April 6, 13 and 28, 2021, the parties' agreement, Rule 33 of the Federal Rules of Civil Procedure, and Local Rule 33.3 of the Civil Rules of the United States District Court for the Southern District of New York, Defendant BBB Logistics, Inc. ("Defendant"), by and through its undersigned attorneys of record, hereby responds to Plaintiffs' First Set of Interrogatories dated April 13, 2021. Defendant bases the following answers on information presently available and reserves the right to revise, correct, add to, or clarify these answers. The fact that Defendant has responded or objected to any interrogatory or part thereof should not be taken as an admission that Defendant

accepts or admits the existence of any fact set forth or assumed by Plaintiffs' request, or that such response or objection constitutes admissible evidence.

Plaintiffs' Interrogatories have been re-stated below in accordance with the parties' agreement, including limiting the time period to 2016 to the present, and the Court's orders.

**INTERROGATORY NO. 2:** Identify all persons with direct or indirect ownership interests in BBB Logistics (whether of record or beneficial). For each such person, describe with particularity the nature and proportion of such ownership interest.

**ANSWER:** Larry Browne owns all of Defendant's outstanding shares.

**INTERROGATORY NO. 3:** Identify all persons who have the ability to direct or cause the direction of the management of or policies related to delivery drivers whom BBB Logistics provides for engagements with Parts Authority LLC, Parts Authority, Inc., Parts Authority Arizona, LLC, or any other Parts Authority-affiliated location.

**ANSWER:** Defendant does not manage the independent owner operators who accept its offers for engagements to deliver products from Parts Authority stores. Nor does Defendant promulgate policies that govern its business relationship with those owner operators. It offers engagements to them on terms that are negotiable and the persons who have authority to negotiate those terms on Defendant's behalf include Larry Browne, Doak Medchill, Wendi Varner and Thomas Baker, except that each such owner operator's fees and time of service are generally negotiated on Defendant's behalf by Thomas Baker and/or Fred Rosenau.

**INTERROGATORY NO. 4:** Identify all vendors or other entities utilized by BBB Logistics for any [sic] to provide any management, operational, administrative, consulting, accounting, financial, or cash management services and the all persons responsible for the retention of any such vendor or entity.

**ANSWER:** Norlyn Enterprises, Inc., which Larry Browne is responsible for retaining,

**INTERROGATORY NO. 5:** Identify all officers and directors of BBB Logistics, Northeast Logistics, Inc., Michigan Logistics, Inc. and Arizona Logistics, Inc. throughout the class period.

**ANSWER:** Larry Browne has been the sole director of the foregoing entities since 2016. The officers of these entities have been as follows: Larry Browne, Chief Executive Officer; Darl

Petty, Chief Financial Officer; Tony Carter, Chief Operating Officer (2016-2019); and Doak Medchill, Chief Operating Officer (2020 to present).

**INTERROGATORY NO. 6:** Identify all states in which drivers for BBB Logistics performed services for any Parts Authority entity or store.

**ANSWER:** Defendant has engaged with independent owner operators to deliver products from Parts Authority stores within the state of Georgia only.

**INTERROGATORY NO. 7:** Identify all agreements between BBB Logistics and any Parts Authority entity or store.

**ANSWER:** None. Defendant has provided services to Parts Authority in accordance with the Master Client Services Agreement between Diligent Delivery Systems and Parts Authority dated August 30, 2010.

**INTERROGATORY NO. 8:** Describe with particularity the business relationship between BBB Logistics and Norlyn Enterprises.

**ANSWER:** Norlyn Enterprises, Inc. provides Defendant with back-office services in the areas of accounting, billing, collection, finance, human resources, information technology, independent contractor resources, legal, marketing, and sales.

Dated: May 4, 2021.  
Rye, New York

/s/ Andrew P. Marks

Andrew P. Marks  
David S. Warner

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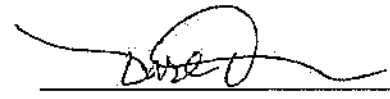
*Attorneys for Defendants Arizona  
Logistics, Inc., BBB Logistics, Inc.,  
Northeast Logistics, Inc., Michigan  
Logistics, Inc., and Larry Browne*

**VERIFICATION**

I, Darl Petty, declare and state that I have been authorized to verify the foregoing answers to Plaintiffs' First Set of Interrogatories to BBB Logistics, Inc. I have read the foregoing answers and they are true and correct to the best of my knowledge, information and belief.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 4, 2021  
Houston, Texas

  
Darl Petty